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January 20, 2021

VIA ECF AND BY FAX (212) 805-7942

The Honorable Alvin K. Hellerstein
Daniel Patrick Moynihan United States
Courthouse, Room 1620
500 Pearl Street
New York, NY 10007

The January 22, 2021 deadline is hereby enlarged until February 21, 2021. The status conference scheduled for January 29, 2021, is adjourned until March 5, 2021, at 10am.

So ordered,
/s/
Alvin K. Hellerstein
1/21/21

Re: Trondheim Capital Partners, LP v. William H. Sadlier, Inc.
Case No.: 20-cv-06286 (AKH)

Dear Judge Hellerstein:

This firm represents Defendant William H. Sadlier (“Sadlier”) with regard to the above referenced matter. We write this letter with the consent of counsel for Plaintiff Trondheim Capital Partners, LP (“Trondheim”), Joe Sibley, Esq., to respectfully request an extension, through February 22, 2021, for Sadlier to comply with the Court’s Order, dated January 8, 2020 (Doc. No. 24). The current deadline is January 22, 2021. No prior request has been made for the requested adjournment.

Since the entry of the Order, the parties have engaged in discussions regarding the scope of the non-disclosure agreement granted by the Court and are in the process of finalizing that agreement. In the interim, Sadlier has commenced the process of gathering documents responsive to Trondheim’s requests. However, considering the wide scope of those requests and reduced access to certain files as a result of the pandemic, it is respectfully requested that the Court grant the requested extension through February 22, 2021 to comply with the Order.

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For the same reasons, the parties jointly request that the Court adjourn the conference scheduled for January 29, 2021 to a date following February 22, 2021.

Respectfully yours,

A handwritten signature in dark ink, appearing to read "Mike Gibson", with a long horizontal flourish extending to the right.

Michael H. Gibson

cc: Counsel for Plaintiff (Via ECF)